



July 8, 2021

Chair Liane M. Randolph  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: Comment on the June 9, 2021 ARB Scoping Plan Natural and Working Lands Workshop

Dear Chair Randolph:

On behalf of the California Habitat Conservation Planning Coalition (CHCPC), thank you for your effort to engage stakeholders and the public across the state to advance climate action with nature-based solutions. Habitat Conservation Plans (HCP) and Natural Community Conservation Plans (NCCP) currently exist – with the state’s support and participation – for the preservation, conservation, protection of land, species, and habitat which allow for growing regions across the state to thrive sustainably. These Plans are ready, willing, and have the long-term infrastructure to acquire, restore, and uplift land that can deliver on the state’s goal to achieve carbon neutrality and build climate resilience. Once the planned acquisitions are fully implemented, the Plans will protect well over 2 million acres. With the state’s support and financial investment, HCPs and NCCPs would be well-positioned to implement proven, science-based strategies to protect and expand the carbon sinks that natural and working lands have to offer.

HCPs and NCCPs are in alignment in two of the four pathways for nature-based climate solutions.

Conservation [land protection and avoided conversion]

Restoration [riparian, oak woodland, wetland, chaparral and shrubland]

HCPs and NCCPs partner with federal, state, regional, and local governments to provide permanent protection of threatened wildlife habitats, most of which is threatened by development and accompanying loss of above and below ground carbon. They include science-based conservation strategies, robust restoration projects, and adaptive management guidelines.

Funding for in perpetuity land management of HCP and NCCP Preserve lands is built into the Plans, including adaptive management. These Plans will provide additional opportunities for carbon sequestration, including soil sequestration, wherever it is compatible with the conservation of endangered, threatened, or rare species.

HCPs and NCCPs also provide the integrated, multi-benefit approach to their regions. Often, these plans are coupled with efforts to reduce urban-suburban sprawl and assist with flood protection, groundwater recharge, and other ecosystem benefits.

With respect to the land types identified in the workshop presentation, CHCPC recommends use of an expanded and uniform system that focuses on land cover, rather than land use. Also, the June 9<sup>th</sup> workshop had slides with various, different, lists which is very confusing. We suggest the following:

- Forests [including oak woodlands or have oak woodlands as a separate category]
- Grasslands [including oak savanna]
- Shrublands, including chaparral, and coastal scrub
- Wetlands
- Riparian
- Croplands
- Submerged aquatic
- Deserts
- Developed lands

CHCPC believes that the term “rangelands” used in some of the slides requires clarification. For example, in southern California, many grasslands are no longer grazed and so are not rangelands

Additional research must be a major component of the 2022 Scoping Plan. The 2018 Ecosystem Carbon Inventory document shows there are huge knowledge gaps which pose significant challenges to quantifying future goals.

The presentation shows that soil is the largest carbon sequestration, even though it only considers the top 30 centimeters of soil. CHCPC recommends a closer and complete look at soil carbon to understand gain a more accurate understanding. The 2018 Ecosystem Carbon Inventory uses 2014 preliminary approximations of ecosystem carbon, to give a total of 5,340 million metric tons. However, Table E-2 of the 2018 document shows there are great uncertainties:

- |                       |                                 |
|-----------------------|---------------------------------|
| Above ground biomass: | +/- 20 % to 40%                 |
| Dead biomass:         | two orders of magnitude         |
| Soil carbon:          | at least +/- 90%, probably more |

Therefore, more research and data collection for the carbon density and sequestration potential below-ground and on natural and working lands is needed for a full understanding of

the state's nature-based options for climate action. Satellite imagery cannot be used to measure soil carbon levels, so state investment in below-ground field work monitoring is critical to fully capture the carbon density and sequestration benefit of various land cover types.

Additionally, CHCPC recommends that the 2022 Scoping Plan incorporate material from the 2030 Natural and Working Lands Implementation Plan of January 2019. This Plan's 2030 implementation goal focuses on demonstrated and quantifiable land-based activities for state supported actions. They include:

- 50-75% reduction in the annual rate of conversion by 2030 [currently 50,000 acres a year]

- Acres per year goals for restoration of various habitat types

Page 22 of this document states, "Importantly, regional land use conservation planning and finer-grained, consensus based localized plans will provide more detailed blueprints for implementation. This may include leveraging Natural Community Conservation Plans in progress or approved by CDFW, which address a cumulative seven million acres across California." This needs expansion to encompass large scale HCPs which include state supported actions beyond required mitigation.

Finally, these types of plans and goals will cost money—from the state and other sources. Without adequate funding, there is no chance that the State's goals will be met. The 2022 Scoping Plan must address funding needs. CHCPC recommends that this funding be directed toward developing sustainable programs, like NCCPs and HCPs, as well as directly funding acquisition, restoration, and management.

Thank you for your time and consideration. Please do not hesitate to contact me, should you require additional information. CHCPC looks forward to the continued partnership.

Sincerely,

A handwritten signature in black ink that reads "John Hopkins". The signature is written in a cursive style and is positioned above a horizontal line that underlines the signature.

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California Habitat Conservation Planning Coalition  
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